

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-9-E**

IN RE: South Carolina Electric & Gas Company's)
Integrated Resource Plan (IRP))
)
)
)
)

**PETITION
TO
INTERVENE**

INTRODUCTION

A filing was made in Commission Docket 2016-9-E, on February 26, 2016, by South Carolina Electric & Gas Company, ("SCE&G"). Petitioner herein is Southern Current LLC. This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation. This Petition to Intervene follows:

PETITIONER

Southern Current LLC.

1. Southern Current LLC is the company resulting from the merger of, "Solbridge Energy LLC" and "Sustainable Energy Solutions, LLC". Southern Current LLC is a Delaware Limited Liability Corporation, duly organized and authorized to conduct business in the State of South Carolina, with its principal place of business at 1634 Ashley River Road, Charleston, South Carolina 29407, ("Southern Current").

2. Southern Current is a renewable energy solutions provider, with a focus on solar photovoltaic energy systems. Southern Current has installed over 300 Solar Energy Systems in seven different States. Southern Current's services include planning, consulting, design, system installation and maintenance and project development.

3. As a developer, Southern Current controls a pipeline of 500 MW of utility scale projects focused mainly in the Southeastern States, including Maryland, North Carolina, South Carolina, Arkansas, Alabama, Mississippi and Florida. Southern Current's projects range in size from 1 to 80 MW.

Request for Intervenor Status.

4. Petitioner, Southern Current, in the name of its two predecessor companies, received approval for intervention from this Commission in Commission Dockets 2015-53-E, 2015-55-E, 2015-203-E, 2015-204-E, 2015-205-E and 2015-362-E. Southern Current received approval for intervention from this Commission in Commission Docket 2015-8-E, Docket 2016-2-E and Docket 2016-1-E.

5. Southern Current is financially impacted by SCE&G's filing, as is outlined in more detail hereinbelow.

6. Specifically, Petitioner Southern Current plans to conduct, business in SCE&G's assigned territory, including sales to SCE&G's Consumers and Petitioner has a material interest in SCE&G's filing.

SCE&G'S Filing.

7. SCE&G's filing was made pursuant to § 58-37-40, S.C. Code Ann., (1976, as amended) and Commission Order No. 1998-502. SCE&G's filing is SCE&G's annual update to its Integrated Resource Plan, ("IRP").

8. SCE&G's annual IRP filing outlines potential infrastructure which will be needed to match SCE&G's forecasted electricity requirements. SCE&G's IRP filing should contain a demand and energy forecast and the utility's acceptable plan for meeting SCE&G's forecast requirements.

9. As outlined hereinabove, Petitioner has substantial business interests in SCE&G's assigned territory in South Carolina.

10. Petitioner's position is that Petitioner has a direct and substantial interest in the decision to be made by this Commission in this Docket, concerning this Commission's review of SCE&G's filing in South Carolina and Petitioner's interest cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner will be impacted by SCE&G's IRP planning, which necessarily influences SCE&G's decision making, concerning demand-side and supply-side resources and those decisions impact the cost of electricity for South Carolina consumers. Therefore, the specifics of SCE&G's IRP are important to Petitioner from a financial standpoint. Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Petitioner has a direct and material interest in SCE&G's filing, and this Commission's review and Petitioner's interest are not adequately represented by the current parties in this Docket.

11. This Commission contemplated intervention in IRP filings, as stated in this Commission's Order No. 2012-96. This Joint Petition to Intervene is timely filed with this Commission.

12. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] [is] allowed so that a full and complete record addressing...views and concerns can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

PETITION TO INTERVENE

14. The granting of SC Solar Development's Petition to Intervene is (i) in the public interest (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed and (iii) contemplated in this Commission's Order 2012-96.

15. Southern Current, LLC is represented by counsel in this proceeding:

Richard L. Whitt
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 300
Columbia, South Carolina 29201
Telephone: (803) 251-7442
Facsimile: (803) 252-3679
RLWhitt@AustinRogersPA.com

WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/S/

Richard L. Whitt
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 300
Columbia South Carolina, 29201
803-251-7442
Counsel for Southern Current LLC

April 12, 2016
Columbia, South Carolina